

## **Remarks**

The Office Action mailed May 8, 2005 has been carefully reviewed and the following remarks have been made in consequence thereof. Claims 10 and 17 have been amended. Claims 11, 12, 13, 18, 19, and 20 have been cancelled in this Amendment. No claims have been withdrawn or added in this Amendment. Claims 1-10 and 14-17 are pending in this application upon entry of this Amendment.

In the Office Action claims 1-8, 10 and 12 were rejected under 35 U.S.C. 103(a) as being unpatentable over U.S. Patent No. 6,622,018 to Erikson ("Erikson") in view of U.S. Patent No. 6,633,757 to Hermann et al. ("Herman et al."). Claims 9 and 11 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Erikson in view of Hermann et al., and further in view of U.S. Patent No. 6,640,253 issued to Schaefer ("Schaefer"). Claims 13-15, 17 and 19-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Erikson in view of Hermann et al and further in view of U.S. Patent Publication 2000/0098840 issued to Hanson et al. ("Hanson"), and claims 16 and 18 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Erikson in view of Hermann, further in view of Hanson as applied to claims 14 and 17 above, and further in view of Schaefer.

### **Claim Rejections - 35 U.S.C. 103(a)**

Claims 1-8, 10 and 12 were rejected under 35 U.S.C. 103(a) as being unpatentable over Erikson in view of Herman et al. Applicant respectfully traverses the rejections.

Independent claim 1 recites, among other limitations, "A method for synchronizing managed data stored by a least first and second computing devices, the method comprising...

reconciling differences in the managed data stored on the first and second computing devices based on the synchronization information to generate reconciliation information; and

transferring the reconciliation information from the second computing device to the first computing device to synchronize the managed data, wherein the managed data represents groups of documents that have been identified or related files that are shared with a group of people working on a particular task or project.”

Neither Erikson, Herman et al., or combinations thereof teach the foregoing limitations. Rather, Erikson teaches a system and method for controlling a remote device over a wireless connection. (Abstract) Herman et al. teaches a scheme and apparatus for a wireless network that distinguishes services offered by a service-providing device in adjacency of the apparatus from services offered by a service-providing device not being in the apparatus' adjacency. (Abstract)

However, the Examiner suggests that Erikson's disclosure of a “link mode negotiation and setup” teaches “reconciling differences in the managed data stored on the first and second computing devices...to generate reconciliation information....” Applicant respectfully submits that Erikson does not disclose the function or purpose of “link mode negotiation and setup.” In particular, Erikson discloses only that “The LMP provides a number of services including sending and receiving of data...and link mode negotiation and setup.” (Col. 7, lines 56-60) Erikson lacks the disclosure, teaching, or suggestion of reconciling differences in the managed data stored on the first and second computing devices or generation of reconciliation information.

Furthermore, the cited art does not teach “transferring the reconciliation information...to synchronize the managed data, wherein the managed data represents groups of documents that have been identified or related files that are shared with a group of people working on a particular task or project.” The Examiner suggests that Erikson teaches the transfer of reconciliation information at columns 7 and 8, lines 64-67 and 1-3 respectively.

Specifically, the Examiner's cited excerpt of Erikson merely describes communications between transceiver 108 and portable computer system 100 or external device 290. The Examiner's cited excerpt does not teach transferring reconciliation information. As discussed above, Erikson is void of any teaching of generating reconciliation information and accordingly does not teach transferring of reconciliation information. Neither does Herman et al. teach "reconciling differences in the managed data stored on the first and second computing devices...to generate reconciliation information."

Additionally, as the Examiner acknowledges, Erikson does not teach that the managed data represents groups of documents that have been identified as part of a collaboration cell, and the documents are stored in independent or related files that are shared with a group of people working on a particular tasks or project. The Examiner suggests that Herman et al. teaches the foregoing limitation.

As stated above, Herman et al. teaches a scheme and apparatus for a wireless network that distinguishes services offered by a service-providing device in adjacency of the apparatus from services offered by a service-providing device not being in the apparatus' adjacency. (Abstract) Accordingly, Herman et al. discloses that any kind of device may be a member of the wireless network. Among the devices included are a "belt computer...which allows the user to surf, dictate, and edit documents while they are moving around." Additionally, a child's computer maybe a member of the wireless network, wherein the child's computer "can interface with other children's computers to facilitate *collaboration*...." (Col. 7, lines 6-14; Emphasis added) The term "collaboration" in Herman et al. is not explained or discussed. Neither does the mere use of the term "collaboration" without further explanation render claim 1 obvious to one of ordinary skill in the art.

Furthermore, assuming *arguendo*, combining Erikson and Herman et al. as suggested by the Examiner will not yield the invention recited by claim 1. As stated above, Erikson is directed to a system and method for controlling a remote device over a wireless connection. Herman et al. is directed to distinguishing services offered by a service-providing

device in adjacency from services offered by a service providing device not being in the apparatus' adjacency. Neither reference, individually or in combination, is directed to the invention as recited by claim 1. As such, combining Erikson and Herman et al. does not render claim 1 obvious. Accordingly, the Examiner has failed to establish a *prima facie* case of obviousness. For at least the foregoing reasons, claim 1 is patentable over the cited art and Applicant requests withdrawal of the rejection. Additionally, claims 2-9, which depend from claim 1 are likewise patentable over the cited art. For at least the above reasons independent claim 14 is also patentable over the cited art. Accordingly, dependent claims 15-16, which depend from independent claim 14 are likewise patentable over the cited art.

Claims 10 and 17 have been amended to include the limitations of dependent claims 13 and 20 respectively. Accordingly claims 13 and 20 have been cancelled. For at least the same reasons independent claim 1 is patentable, independent claims 10 and 17 are likewise patentable over the cited art. Additionally, claims 11, 12, 18, and 19 were also cancelled to avoid any potential new issues requiring further consideration or search by the Examiner. Accordingly, claims 1-10 and 14-17 are patentable over the cited art. Moreover, the addition of secondary references, namely Schaefer and Hanson, do not cure the deficiencies in Erikson and Herman et al. As such, Applicant respectfully requests withdrawal of the rejections.

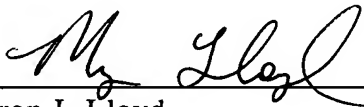
**CONCLUSION**

In summary, claims 1-10 and 14-17 meet the substantive requirements for patentability. The case is in appropriate condition for allowance. Accordingly, such action is respectfully requested.

If a telephone or video conference would expedite allowance or resolve any further questions, such a conference is invited at the convenience of the Examiner.

Respectfully submitted,

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